

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03-md-1570 (GBD)(SN) ECF Case
This document relates to: <i>Ortiz, Lisa as Personal Representative of the Estate of Angel R. Ortiz,</i> vs. <i>The Islamic Republic of Iran</i>	22-cv-03100 (GBD)(SN) ECF Case

**PLAINTIFF’S NOTICE OF MOTION FOR ENTRY OF PARTIAL
FINAL DEFAULT JUDGMENT AGAINST THE ISLAMIC REPUBLIC OF
IRAN AS TO LIABILITY AND DAMAGES**

PLEASE TAKE NOTICE that upon the accompanying Declaration of John M. Eubanks (“Eubanks Declaration”), with exhibits, and the accompanying memorandum of law, the Plaintiff identified in Exhibit A to the Eubanks Declaration, respectfully moves this Court for an Order of judgment by default as to liability against the Islamic Republic of Iran (“Iran”) as to Plaintiff’s claims under 28 U.S.C. § 1605A(c).

Furthermore, the Plaintiff identified on Exhibit A to the Eubanks Declaration respectfully moves this Court for an Order awarding (1) compensatory damages for pain and suffering in an amount commensurate with the injuries that Angel R. Ortiz sustained during the Terrorist Attacks on September 11, 2001 and in accordance with prior precedent in the U.S. District Court for the District of Columbia in similar cases factoring in an upward departure on damages values based on the indelible impact of the Terrorist Attacks of September 11, 2001; (2) prejudgment interest at the rate of 4.96 percent per annum, compounded annually for the period from September 11, 2001 until the date of the judgment; (3) leave for the Plaintiff identified in Exhibit A to seek punitive damages, economic damages, or other damages at a later date; and (4) for all other Personal-Injury

Plaintiffs not appearing on Exhibit A, to submit applications for damages awards in later stages, to the extent such awards have not previously been addressed.

Dated: June 3, 2024

/s/ John M. Eubanks
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